

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Order of Reconsideration)	DA 17-128

Comments of the Writers Guild of America, East, AFL-CIO

The Writers Guild of America, East, AFL-CIO (the “WGAE”) submits these comments in response to the Wireline Competition Bureau (the “Bureau”) reconsideration of the Lifeline Broadband Provider designations dated March 2, 2017 (the “Notice”).

The WGAE represents thousands of members who write comedies, dramas, and nonfiction programs for film, television, radio, and digital media. Many work in news and public affairs for digital media outlets, major television and radio networks and stations, and for public broadcasting, where they write, produce, edit, and create graphics. Our members’ material is shown in theaters, broadcast over the airwaves, transmitted on satellite and cable television, and distributed on the Internet.

We respectfully submit that the Commission reverse the Bureau’s Order on Reconsiderationⁱ that has undermined Lifeline’s important mission of bringing affordable and life-saving communications services to poor people. It is critical that Lifeline Broadband Provider designations be reinstated for nine carriers prepared to offer Lifeline broadband services.

The Lifeline program was established by the Reagan Administration to ensure low-income households have a landline phone, an essential utility. The nonpartisan program was last updated to include another essential utility, broadband services.

Times have changed, as have our lifelines. Landline phones were the nation's lifeline in the 1980s; today, households depend on broadband (high-speed) internet.

A 2015 Pew Broadband Studyⁱⁱ found that nearly half of all homes with incomes under \$30,000 do not have Internet access, even as “Americans—both broadband users and those who do not have broadband—are increasingly likely to view home broadband as a key tool for accessing information that is important to their lives.”

High-speed Internet has become the modern world's lifeline. The ability to be online is necessary to communicate, bank and pay bills, complete job-related tasks, apply for employment, and find educational resources for homework and career-advancement, as well as almost every other facet of one's life. Anyone without high-speed internet is at a dangerous disadvantage.

There is no evidence of widespread abuse in the Lifeline program, the Bureau must uphold its obligation to ensure that low-income Americans can access critical information or reach emergency contacts. The Order on Reconsideration that overturned the modification of the Lifeline program places the lives and well-being of Americans at risk. It is imperative in this day and age that broadband be part of the Lifeline program.

ⁱ Telecommunications Carriers Eligible for Universal Service Support, Lifeline and LinkUp Reform and Modernization, WC Docket Nos. 09-197 & 11-42, Order on Reconsideration, DA 17-128 (rel. Feb. 3, 2017)

ⁱⁱ <http://www.pewinternet.org/2015/12/21/home-broadband-2015/>